

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF WISCONSIN**

Fond Du Lac Bumper Exchange, Inc., and Roberts
Wholesale Body Parts, Inc. on Behalf of Themselves
and Others Similarly Situated,

Plaintiffs,

v.

Jui Li Enterprise Company, Ltd., et al.,

Defendants.

Case No. 2:09-cv-00852-LA

**DIRECT PURCHASER PLAINTIFFS' MOTION FOR FINAL APPROVAL OF
SETTLEMENT WITH AP AUTO PARTS INDUSTRIAL LTD.**

PLEASE TAKE NOTICE that Direct Purchaser Plaintiffs ("Plaintiffs") respectfully move this Court for an order: (i) granting final approval of the settlement with AP Auto Parts Industrial Ltd. ("API"); (ii) affirming certification of a Settlement Class and appointment of Vincent J. Esades of Heins Mills & Olson, P.L.C. and Jason S. Hartley of Hartley LLP as Co-Lead Settlement Class Counsel and K. Scott Wagner of Mallery & Zimmerman, S.C. as Liaison Settlement Class Counsel; and appointment of Fond du Lac Bumper Exchange, Inc. and Roberts Wholesale Body Parts, Inc., as Class Representatives; and (iii) approving the Plan of Allocation for the settlement funds.

This motion is based on the accompanying Direct Purchaser Plaintiffs' Memorandum of Law in Support of Motion for Final Approval of the AP Auto Parts Industrial Ltd. Settlement; Declaration of Carla A. Peak on Implementation and Overall Adequacy of Settlement Notice Plan; memorandum and declarations filed in support of Direct Purchaser Plaintiffs' motion for preliminary approval of the settlement and any accompanying exhibits (ECF Nos. 1220, 1221,

1222, 1223 and 1224); and on any evidentiary submissions that may be presented at hearing on this motion.

Dated: July 8, 2019

Respectfully submitted,

By: s/Jason S. Hartley _____
Jason S. Hartley
Jason Lindner
HARTLEY, LLP
101 W. Broadway, Suite 820
San Diego, CA 92101
Telephone: (619) 400-5822
Facsimile: (619) 400 5832
Email: hartley@hartleyllp.com
lindner@hartleyllp.com

Vincent J. Esades
HEINS MILLS & OLSON, P.L.C.
310 Clifton Avenue
Minneapolis, MN 55403
Telephone: (612) 338-4605
Facsimile: (612) 338-4692
Email: vesades@heinsmills.com

Direct Plaintiffs' Interim Co-Lead Counsel

K. Scott Wagner
MALLERY & ZIMMERMAN, S.C.
731 North Jackson Suite 900
Milwaukee, WI 53202
Telephone: (414) 271-2424
Facsimile: (414) 271-8678
Email: swagner@mzmilw.com

Direct Plaintiffs' Liaison Counsel